

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Complaint on Sunday
and Holiday Collections

Docket No. C2001-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO PROPOSED PROCEDURAL SCHEDULE OF DOUGLAS CARLSON
(May 1, 2002)

Along with the second part of his direct testimony, complainant Carlson filed a proposed procedural schedule on April 24, 2002. As Mr. Carlson correctly observed, developing an appropriate schedule is complicated by several contingencies. One contingency identified by him was the potential for oral cross-examination regarding his testimony, which he would prefer to avoid. The Postal Service at this point views it unlikely that it would request oral cross-examination. Beyond that, the Postal Service is still trying to evaluate the most appropriate response to the issues raised by the testimony filed last week. The essence of what Mr. Carlson has proposed is a deadline of May 22 for written discovery on his testimony, a deadline of June 11 for notification of an intent to file testimony in response to his, and, in the absence of any such testimony, initial briefs due on July 2 and reply briefs due on July 16. On its face, this is a reasonable proposal, and the Postal Service believes that there is a good possibility that the proceeding can be brought to a conclusion in accordance with this schedule. Perhaps more to the point, the Postal Service has no immediate alternative suggestions. Nonetheless, given the relatively short time the testimony has been available, and the number of layers of the organization that ultimately might need to be involved in developing the Postal Service's response, the Postal Service cannot rule out the possibility that it later may prove difficult to meet some of these deadlines. Rather

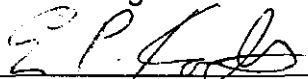
than try to minimize potential problems now by building into the schedule extensions of time that may or may not eventually prove necessary, however, our suggestion is instead the adoption of the schedule proposed by Mr. Carlson (or one similar thereto), with the understanding that if the Postal Service encounters the need to request schedule revisions, it would do so by filing the appropriate motions.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon:

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